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VIA E-FILING

June 15, 2024

The Honorable Vera M. Scanlon
United States District Court
Eastern District of New York
225 Cadman Plaza East, 1214 South
Brooklyn, New York 11201

Re: Sanchez v. EZ Parking, et al., 23 cv 4052

Dear Judge Scanlon:

I represent Plaintiff in the above-referenced matter. I write to request a conference regarding several deficiencies in the discovery responses of Defendant EK Premier Services, which were first raised via a letter to the Court dated April 9. As the Court will recall, counsel appeared before your Honor on May 21, and a ruling regarding the referenced discovery issues was deferred pending an appearance scheduled for later that same day before Judge Donnelly.

At that later appearance, the issue of Defendant EK Premier Services' desire to move to dismiss Plaintiff's claims on jurisdictional grounds was discussed. In connection with that discussion, Plaintiff agreed to amend his Complaint to add allegations regarding that jurisdictional issue, and EK Premier was to indicate to the Court whether it intended to press forward with its intended motion.

Plaintiff filed his Amended Complaint on May 28. To date, EK Premier Services has not taken any action regarding the motion, and seemingly does not intend to do so. Plaintiff therefore believes it is necessary to resolve the outstanding discovery issues so that the parties may

complete discovery. We thank the court for its consideration of this request.

Respectfully submitted,

/s/

Vincent E. Bauer